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March 3, 2025

VIA ECF

Chambers of the Honorable Jesse M. Furman
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007
Furman_NYSDChambers@nysd.uscourts.gov

Re: *United States v. Frank Filimaua*, 1:22CR261-001 (JMF);
1:22CR261-001 (JMF)

Sentencing Hearing Date: May 25, 2025

The Honorable Jesse M. Furman

On behalf of defendant Frank Filimaua and pursuant to the Court's Individual Rules and Practices in Criminal Cases ("Rules"), undersigned counsel is writing this unopposed letter-motion seeking leave to file a sentencing memorandum in excess of twenty-five pages. (See Rules at §9B). Consistent with the Procedures for Filing Documents with Redactions (*see id.* at ¶6C), counsel respectfully submits that the instant redactions comply with the E-Government Act of 2002 and the Southern District's ECF Privacy Policy. (*See id.* at 10(A).)

Counsel is mindful of the Court's admonition that the "quality of sentencing letters usually matters more than quantity." (*Id.* at ¶9C). Nevertheless, as presently edited, the defendant's sentencing memorandum is twenty-nine pages (exclusive of the Table of Contents).

In substantial part, the bases for the length of the defendant's prospective filing include an analysis of: (1) [REDACTED]

(2) Mr.

Filimaua's acceptance of responsibility [REDACTED]

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[REDACTED]; (3) [REDACTED]

; and (4) [REDACTED]

On March 3, 2025, counsel contacted Assistant United States Attorney Danielle Kudlo, who stated that the government has no objection to the instant letter-motion.

As a result, counsel respectfully requests leave to submit a sentencing memorandum on Mr. Filimaua's behalf which exceeds the Court's twenty-five-page limitations.

Respectfully Submitted,

POTOMAC LAW GROUP

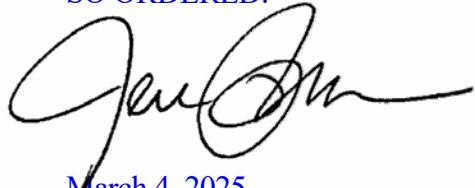


Jonathan Rosen

cc: AUSA Danielle M. Kudlo

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 27.

SO ORDERED.



March 4, 2025